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October 28, 2015

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By ECF

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Hon. Christian F. Hummel
United States Magistrate Judge
U.S. District Court for the Northern District of New York
445 Broadway, Room 441
Albany, NY 12207

Re: John Doe v. Ejercito De Liberacion Nacional, Case No. 15-mc-00023-GLS-CFH

Dear Judge Hummel:

We represent Third Party Claimants Grupo Arosfran Empreendimentos E Participacoes SARL and Ovlas Trading, S.A. ("Claimants") in the above case. We respectfully request a brief extension of time to file our response to the Stansell Third Party Respondents' Motion to Transfer and/or Dismiss Third Party Interpleader Complaint (DE 24).

Claimants' response is currently due on November 2, 2015, and we request an extension of time to November 10, 2015. On October 19, the Court granted Garnishee Bank of New York Mellon's request for the same extension (Telephone Conference Minute Entry). Claimants have a number of briefs due in related litigation over the coming weeks. Moreover, granting this request would keep briefing on the Motion to Transfer on the same schedule and allow for more efficient case management.

We have conferred with counsel to the Stansell Respondents (our response would be to the Stansell's motion), and they do not oppose this request. We have made no previous request for an extension.

We thank you for consideration of this matter.

Respectfully,

/s/ David W. Bowker
David W. Bowker

cc: All counsel of record (by ECF)